

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

C-14J

August 24, 2004

EPA Region 5 Records Ctr.

262731

MEMORANDUM

SUBJECT:

Citizen Suit Under CERCLA

FROM:

Jacqueline Miller

Associate Regional Counsel

TO:

Richard C. Karl, Acting Director

Superfund Division

The Office of Regional Counsel has received the attached notice for a citizen suit. Please review the notice to determine whether U.S. EPA is taking or intends to take enforcement action at the referenced facility or site and convey your determination to me via memorandum (C-14J) or telephone (886-7167), or to Deloris Johnson, telephone (886-6806). Enforcement action initiated by U.S. EPA at the facility or site prior to sixty days after receipt of the attached notice may preclude the citizen suit.

cc: Bertram Frey

Eric Cohen

Attorneys at Law



30 South Wacker Drive • 29th Floor • Chicago, Illinois 60606-7484

Telephone (312) 207-1000

Edward V. Walsh (312) 207-3898 ewalsh@sachnoff.com Facsimile (312) 207-6400 www.sachnoff.com

June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Ace Hardware 701 Brazos Street, Suite 1050 Austin, TX 78701

RE: Soil/Groundwater Contamination Downers Grove Illinois

Notice of Suit CERCLA, RCRA, State Laws

Dear Ladies and Gentlemen:

This letter gives notice that Scot Inc., of Downers Grove, Illinois (hereafter "Scot") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

Comprehensive Environmental Response, Compensation, and Liability Act

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Ames Supply Company 1126 Pennsylvania Elmira, NY 14904

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Arrow Gear Co. 1900 Firstier Bank Bldg. 233 South 13th Street Lincoln, NE 68508

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

Dear Ladies and Gentlemen:

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Artec Industries, Inc. 20338 Brentwood Livonia, MI 48152

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Atlas Tubing Co. (a/k/a Da-Kay Enter.) 4525 Gollihar St Ste 114 Corpus Christi, TX

RE: Soil/Groundwater Contamination Downers Grove Illinois

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Bales Mold Service 323 E. Jackson Harlingen, TX 78550

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Bison Gear & Eng Corp. 222 N Lasalle Street 2400 Chicago, IL 60601

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Brennan Eng. Corp. 1421 Sw 17th Street Boca Raton, FL 33486

RE: Soil/Groundwater Contamination Downers Grove Illinois

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Bridges Electric, Inc. 407 W. Searcy St. Heber Springs, AR 72543

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Contemporary Control Systems, Inc. 5120 Main St Ste 3
Downers Grove, IL 60515

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

CVP Systems, Inc. 801 Adlai Stevenson Drive Springfield, IL 62703-4261

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Diamond Power Specialty, Inc., 208 So Lasalle St, Suite 814 Chicago, IL 60604-1101

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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Dicke Tool 314 E Thayer Ave; Po Box 400 Bismarck, ND 58502-0400

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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Downers Grove Radiator 1513 Ogden Ave Downers Grove, IL 60515-2737

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Downers Grove Reporter 922 Warren Ave Downers Grove, IL 60515-3600

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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Downers Grove Sanitary District 2710 Curtiss St. Downers Grove, IL 60515

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

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DuPage Mfg. Co. 33 North LaSalle Street Chicago, IL 60602-2607

RE: Soil/Groundwater Contamination Downers Grove Illinois

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June 18, 2004

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DynaGear, Inc. 1200 S. Pine Island Rd Plantation, FL 33324

RE: Soil/Groundwater Contamination Downers Grove Illinois

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June 18, 2004

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Elite Electronic Engineering Co. 1516 Centre Circle Downers Grove, IL 60515

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

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Flavorchem 1525 Brook Drive Downers Grove, IL 60515-1024

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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Flexible Steel Lacing Co. 2525 Wisconsin Ave Downers Grove, IL 60515

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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Fusibond, Inc. 2615 W Curtiss Downers Grove, IL 60515-4003

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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General Battery 1111 W. Long Lake, Ste. 300 Troy, MI 48098

RE: Soil/Groundwater Contamination Downers Grove Illinois

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Graphics Plus 2608 Rothland Plano, TX 75023

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

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Grayhill Moldtronics, Inc. 40 Shuman Blvd Ste 150 Naperville, IL 60563

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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Grove Printing, Inc. 400 South 6th St. Waco, TX

RE: Soil/Groundwater Contamination Downers Grove Illinois

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Hollister-Stier Laboratories, Inc. 520 Pike St Seattle, WA 98101

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

International Piping Services Co. 208 So LaSalle St, Suite 814 Chicago, IL 60604-1101

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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J.L. Clark Mg. Co. (Div. of Atlas Tubing) 4525 Gollihar St Ste 114 Corpus Christi, TX

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BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Johnson Printers 750 W. New Haven Ave. Melbourne, FL 32901

RE: Soil/Groundwater Contamination Downers Grove Illinois

Notice of Suit CERCLA, RCRA, State Laws

Dear Ladies and Gentlemen:

This letter gives notice that Scot Inc., of Downers Grove, Illinois (hereafter "Scot") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

Comprehensive Environmental Response, Compensation, and Liability Act

Attorneys at Law

30 South Wacker Drive • 29th Floor • Chicago, Illinois 60606-7484
Telephone (312) 207-1000

Edward V. Walsh (312) 207-3898 ewalsh@sachnoff.com Facsimile (312) 207-6400 www.sachnoff.com

June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Lindy Manufacturing Company 6s167 Canterbury Ct Naperville, IL 60540

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

Dear Ladies and Gentlemen:

This letter gives notice that Scot Inc., of Downers Grove, Illinois (hereafter "Scot") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Lockformer Company / Met-Coil Systems Corporation 711 Ogden Avenue Lisle, IL 60532

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

Dear Ladies and Gentlemen:

This letter gives notice that Scot Inc., of Downers Grove, Illinois (hereafter "Scot") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Lovejoy, Inc. 5455 Hewitt Place Way King George, VA 22485-3754

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Magnetrol International Inc. 5300 Belmont Rd Downers Grove, IL 60515-4400

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

Dear Ladies and Gentlemen:

This letter gives notice that Scot Inc., of Downers Grove, Illinois (hereafter "Scot") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Maple Grove Automotive, Ltd. 2315 Maple Ave Downers Grove, IL 60515-4225

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

Dear Ladies and Gentlemen:

This letter gives notice that Scot Inc., of Downers Grove, Illinois (hereafter "Scot") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Moldtronics, Inc. 40 Shuman Blvd Ste 150 Naperville, IL 60563

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

Dear Ladies and Gentlemen:

This letter gives notice that Scot Inc., of Downers Grove, Illinois (hereafter "Scot") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Molex, Inc. 2222 Wellington Court Lisle, IL 60532

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

Dear Ladies and Gentlemen:

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Morey Corporation 100 Morey Dr Woodridge, IL 60517

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

Dear Ladies and Gentlemen:

This letter gives notice that Scot Inc., of Downers Grove, Illinois (hereafter "Scot") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Norwood Marking Systems 2538 Wisconsin Ave Downers Grove, IL 60515-4230

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

Dear Ladies and Gentlemen:

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Packard Instrument Co. 1 Commercial Plaza Hartford, CT 06103

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Precision Brand Products, Inc. 3500 Wolf Rd Franklin Pk, IL 60131-1321

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

Dear Ladies and Gentlemen:

This letter gives notice that Scot Inc., of Downers Grove, Illinois (hereafter "Scot") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Principal Mfr. Co. 660 Lasalle Pl Ste 3a Highland Park, IL 60035

RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Rexnord - plant #1 225 Hillsborough Street Raleigh, NC 27603

RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws

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Rexnord - plant #2 225 Hillsborough Street Raleigh, NC 27603

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

RHI Hildings, Inc. / Fairchild Corporation 1200 South Pine Island Road Plantation, FL 33324

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

ServiceMaster, Inc. 1200 South Pine Island Road Plantation, FL 33324

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Spannagel Tool & Die 336 E Walnut St Roselle, IL 60172

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

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Tricon Manufacturing 20277 Valley Blvd Ste H Walnut, CA 91789

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

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Vaughan Seed Co. 319 S Coteau Pierre, SD 57501-3108

RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

White Lake Building Corporation 1126 Pennsylvania Elmira, NY 14904

> RE: Soil/Groundwater Contamination Downers Grove Illinois Notice of Suit CERCLA, RCRA, State Laws

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June 18, 2004

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William Helwig 250 Pine Street Millersburg, PA 00000-0000

RE: Soil/Groundwater Contamination Downers Grove Illinois
Notice of Suit CERCLA, RCRA, State Laws

Dear Ladies and Gentlemen:

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Attorneys at Law

June 18, 2004 Page 2

Additionally, Scot may bring an action against you for violation of Section 103(a) of CERCLA (42 USC 9603(a)). You were the person in charge of an onshore facility and have failed to notify the National Response Center of a release of a hazardous substance.

Scot may bring actions under CERCLA in 60 days and will pursue all applicable remedies and relief available under CERCLA.

Resource Conservation and Recovery Act

Please be advised that pursuant to Section 7002 of the Resource Conservation and Recovery Act (RCRA) (42 USC 6972), Scot intends to sue the above entity and/or individual for violations of RCRA and applicable regulations, and for contributing to conditions which may present an imminent and substantial endangerment to health or the environment. Specifically, the above entity and/or individual is or was the owner or operator of the property or otherwise contributed to the contamination. There may be other hazardous wastes, solid wastes or regulated substances which were also released at your property(ies) which present or may present an imminent and substantial threat to public health and the environment. Hazardous wastes and/or solid wastes and/or regulated substances have not been properly handled, stored, or disposed pursuant to the requirements of RCRA and regulations promulgated thereunder. The hazardous wastes and/or solid wastes and/or regulated substances remain and continues to migrate onto the Scot property and downstream locations.

Scot may bring an action pursuant to 42 USC 6972(a)(1)(A) in 60 days; and an action pursuant to 42 USC 6972(a)(1)(B) in 90 days.

State Claims

This notice also serves as your notice of Scot's demand for removal and ejectment of the above entity's and/or individual's contaminants from Scot's property. The toxic and dangerous chemicals from the above entity's and/or individual's facility have migrated across property boundaries and are now located in groundwater underlying Scot's facility. Scot hereby demands that, within 10 days, you remove all solvents and other chemicals or compounds which migrated from the above entity's and/or individual's facility. Upon the expiration of this 10-day period, Scot will pursue state claims, including but not limited to negligence, nuisance, trespass, continuing intentional trespass and violation of the Illinois Environmental Protection Act.

Conclusion

The above claims may be combined with other federal or state statutory or regulatory actions, and with other common law actions. If we do not reach settlement with you before the notice periods of 60 and 90 days expire, Scot will bring suit against you in federal court. I have

Attorneys at Law

June 18, 2004 Page 3

been retained to represent Scot in this matter. If you have any questions or would like to discuss this matter further, please contact me.

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Very truly yours,

Edward V. Walsh, III for SACHNOFF & WEAVER, LTD.

cc: Hon. Michael Leavitt, Administrator, USEPA

Hon. Bharat Mathur, Acting Regional Administrator, USEPA

Hon. John Ashcroft, Attorney General, U.S. Department of Justice

Hon. Renee Cipriano, Director, IEPA

Hon. Lisa Madigan, Attorney General, State of Illinois

Hon. Rod Blagojevich Governor, State of Illinois

(all via certified mail)

Attorneys at Law

June 18, 2004 Page 4

Mr. Michael Leavitt, Administrator United States Environmental Protection Agency 1200 Pennsylvania Avenue, N.W., 1101A Washington, D.C. 20460

Mr. Bharat Mathur Acting Regional Administrator United States Environmental Protection Agency 77 West Jackson Boulevard R-19J Chicago, IL 60604

Hon. John Ashcroft Attorney General United States Department of Justice 950 Pennsylvania Avenue, N.W. Washington, DC 20530

Hon. Renee Cipriano, Director Illinois Environmental Protection Agency 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276

Hon. Lisa Madigan Attorney General State of Illinois 100 West Randolph Street 12th Floor Chicago, IL 60601

Hon. Rod Blagojevich Governor of the State of Illinois 100 West Randolph Street Suite 15-200 Chicago, IL 60601